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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 SHONDELL PITTS, individually and as legal
13 guardian of P.P.,

Case Number:
2:19-cv-01974-JCM-VCF

14 Plaintiffs,

15 vs.

16 LAS VEGAS METROPOLITAN POLICE
17 DEPARTMENT, a political subdivision of
18 Clark County, Nevada; DAVID
19 NESHEIWAT, individually and in his official
20 capacity; FUELZONE MART 2, LLC, a
21 Nevada limited liability company; ALLEN
22 JACKSON, an individual and DOES 1
23 through 10,

24 Defendants.

25 **STIPULATION AND ORDER TO EXTEND DISPOSITIVE MOTION DEADLINES**

26 **(FIRST REQUEST)**

27 Pursuant to LR 1(A) 6-1, Defendants Las Vegas Metropolitan Police Department and Ofc. Nesheiwat ("LVMPD Defendants"), by and through their attorneys of record, Marquis Aurbach Coffing; Defendants Fuel Zone Mart 2 LLC and Allen Jackson, by and through their attorneys of record Hall, Jaffe & Clayton, LLP; and Plaintiffs Shondell Pitts, individually and as legal guardian of P.P., by and through their attorneys of record, Law Offices of Mitchell S. Bisson, submit this Stipulation and Order to Extend Dispositive Motion Deadline (First Request). The parties respectfully request that the dispositive motion deadline be extended by thirty (30) days.

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1 Currently, the dispositive motion deadline is October 8, 2021. (ECF No. 46) The
2 parties respectfully request that the dispositive motion deadline be extended until November
3 8, 2021. Similarly, the parties hereby request that the last day to file a Joint Pre-Trial Order
4 shall be extended thirty (30) days or until December 8, 2021. In the event dispositive
5 motions are filed, the date for filing the Joint Pre-Trial Order shall be suspended until thirty
6 (30) days after decision on the dispositive motions or upon further Order by the Court
7 extending the time period in which to file the Joint Pre-Trial Order.

8 The parties state that, pursuant to Local Rule 6-1, that good cause exists for the
9 requested extension. Currently, the parties are engaged in settlement discussions and
10 believe that a settlement may be reached in the near future. Therefore, the parties seek to
11 avoid unnecessary fees and costs with drafting dispositive motions.

12 Further, the parties believe that dispositive motions may resolve several of the claims
13 (and maybe the entire case) and therefore could conserve judicial resources.

14 This extension request is made in good faith, jointly by the parties, and not for the
15 purposes of delay. Trial in this matter has not yet been set. Moreover, since this request is a
16 joint request, neither party will be prejudiced.

17 This is the first request for extension of the dispositive motion deadline in this
18 matter. The parties respectfully submit that the reason set forth above, constitute compelling
19 reasons for the extension.

20 Plaintiffs recently settled with Defendants Fuel Zone and Allen Jackson. The
21 settlement documents are being finalized.

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WHEREFORE, the parties respectfully request that this Court extend the deadline to file dispositive motions in the above-captioned case for thirty (30) days, up to and including November 8, 2021.

IT IS SO STIPULATED this 7th day of October, 2021.

MARQUIS AURBACH COFFING

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By: s/Mitchell S. Bisson

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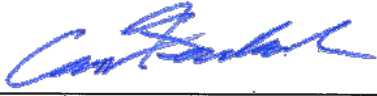
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Attorney for Defendants Fuel Zone and
Jackson

ORDER

IT IS SO ORDERED this 7th day of October, 2021.


United States District Court Judge
Magistrate

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